

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

ENTRI, LLC,

Plaintiff,

vs.

GODADDY.COM, LLC,

Defendant.

Case No. 1:24-cv-00569-AJT-WEF

**GODADDY.COM, LLC'S MEMORANDUM REGARDING MOTION TO FILE UNDER
SEAL THE UNREDACTED VERSION OF GODADDY'S REPLY IN SUPPORT OF ITS
MOTION TO DISMISS**

Defendant GoDaddy.com, LLC ("GoDaddy"), by counsel and pursuant to Local Civil Rule 5, states as follows regarding its Motion to File Under Seal the Unredacted Version of GoDaddy's Reply in Support of Its Motion to Dismiss, filed September 10, 2024 ("Motion"). The unredacted version of GoDaddy's reply references the names of certain of Plaintiff Entri, LLC's ("Entri") current, prospective, or former clients. Entri has previously sought to seal the identities of these clients. *See* Dkt. Nos. 5, 6, 24, 25, 52. GoDaddy thus filed this Motion based solely on Entri's designation of this information as confidential.

As stated in prior briefing before the Court, GoDaddy believes Entri cannot demonstrate the "compelling" interests required to overcome the public's First Amendment right of access to judicial records and seal the identities of its clients in connection with GoDaddy's dispositive motion to dismiss and reply. *Taylor v. Kellog Brown & Root Servs., Inc.*, 2009 WL 10689733, at *2 (E.D. Va. Dec. 18, 2009); *see* Dkt. 53. Because GoDaddy opposes sealing this information, pursuant to Local Civil Rule 5(C), GoDaddy does not include the information described in Local

Civil Rule 5(C)(2)–(4) in this memorandum or submit a proposed order. Entri bears the burden of submitting a response to this Motion providing the information described in Local Civil Rule 5(C)(2)–(4) and a proposed order if it wishes that this information remain under seal.

Dated: September 10, 2024

Respectfully submitted,

/s/ Douglas J. Dixon

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CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2024, a true and correct copy of the foregoing was served using the Court's CM/ECF system, with electronic notification of such filing to all counsel of record.

/s/ Chad E. Kurtz
Chad E. Kurtz
Attorney for Defendant GoDaddy.com, LLC